

Exhibit 1: Environmental Regulatory Burden of a SOCMA Member Company

Brief Description of Applicable Air Requirement	Pollutants	Regulatory Citation	Reporting Requirement (Yes/No)	Record Keeping Requirement (Yes/No)
General Requirements: Circumvention. This rule prohibits concealment or dilution of air pollutants emitted, which would violate Chapter 20.	All regulated pollutants	9 VAC 5-20-70	No	No
General Requirements: Relationship of state regulations to federal regulations. This rule does not impose specific requirements for sources or emission units.	All regulated pollutants	9 VAC 5-20-80	No	No
General Requirements: Air quality program policies and procedures. This rule does not impose specific requirements for sources or emission units.	All regulated pollutants	9 VAC 5-20-121	No	No
General Requirements: Registration. This rule does not impose specific requirements for sources or emission units.	All regulated pollutants	9 VAC 5-20-160	No	No
Excess emissions, as defined at 9 VAC 5-10-20, which last for more than one hour, must be reported to the board as described by 9 VAC 5-20-180.	All regulated pollutants	9 VAC 5-20-180 Permit dated 10/5/01; Condition 31. Permit dated 4/9/92; Condition 12.	Yes	Yes
General Requirements: Air Quality Control Regions Pittsylvania County is located in the Central Virginia Intrastate Air Quality Control Region (AQCR 3.) This rule does not impose specific requirements for sources or emission units.	None	9 VAC 5-20-200	No	No
General Requirements: Lists prevention of significant deterioration (PSD) areas. Pittsylvania County is a PSD area for all PSD pollutants.	PSD Pollutants	9 VAC 5-20-205	No	No
Existing Stationary Sources-Part I: Special Provisions - Applicability. This rule does not impose specific requirements for sources or emission units.	All regulated pollutants	9 VAC 5-40-10	No	No
Existing Stationary Sources-Part I: Special Provisions- Compliance. This rule gives general requirements for demonstrating compliance with applicable portions of Chapter 40, but does not impose specific requirements for sources or emission units.	All regulated pollutants	9 VAC 5-40-20	No	No
Existing Stationary Sources - Part I: Special Provisions - Notification, records, and recording. This rule requires existing source to keep records to determine emissions and regulatory exemption status.	All regulated pollutants	9 VAC 5-40-50F	Yes	Yes
Existing Stationary Sources - Part II: Emission Standards - visible emissions. Visible emissions shall not exceed 20% opacity, except for one six minute period in any one hour not to exceed more than 60% opacity. The presence of water vapor shall not be a violation of this section	Visible emissions	9 VAC 5-40-80	No	No
Existing Stationary Sources - Part II: Emission Standards - Test Methods and Procedures. The provisions of 9VAC 5-40-20 A2 apply to determine compliance with the standard prescribed in 9 VAC 5-40-80.	Visible emissions	9 VAC 5-40-110	No	No
Existing Stationary Sources - Part II: Emission Standards. Applicability and designation of affected facility. Fuel Burning Equipment (Rule 4-8). This rule does not impose specific requirements for sources or emission units.	PM/PM10, SO2, visible emissions	9 VAC 5-40-880	No	No
Existing Stationary Sources - Part II: Emission Standards - Fuel Burning Equipment (Rule 4-8). Standard for particulate matter. Limits the maximum allowable particulate matter (PM) emission, rate to 0.565 lbs/MMBtu of heat input. The allowable emission rate is calculated using $E = 1.0906 H - 0.2594$. E = the allowable emission rate and H = the total maximum hourly heat input for F1 plus F2, or 12.6 MMBtu/hr.	PM/PM10	9 VAC 5-40-900	No	No
Existing Stationary Sources - Part II: Emission Standards. Fuel Burning Equipment (Rule 4-8). Standard for Sulfur Dioxide. Limits total maximum SO2 emissions from F1 and F2 to 33.26 pounds per hour. The allowable emission rate is calculated using $S = 2.64K$. S = the allowable emission rate and K = the maximum hourly heat input for F1 plus F2, or 12.6 MMBtu/hr.	SO2	9 VAC 5-40-930	No	No
Existing Stationary Sources-Part II: Emission Standards - Fuel Burning Equipment (Rule 4-8). Visible emissions shall not exceed 20% opacity, except for one six minute period in any one hour not to exceed more than 60% opacity. The presence of water vapor shall not be a violation of this section.	Visible emissions	9 VAC 5-40-940	No	No
Existing Stationary Sources-Part II: Emission Standards-Fuel Burning Equipment (Rule 4-8). Compliance. Only the provision of 9 VAC 5-40-20 A.2 applies specifically to F1 and F2 with regard to determining compliance with 9 VAC 5-40-940.	Visible emissions	9 VAC 5-40-980	No	No
Existing Stationary Sources-Part II: Emission Standards - Fuel Burning Equipment (Rule 4-8). Notification and recordkeeping. See description of applicable requirement for 9 VAC 5-40-50F.	All regulated pollutants	9 VAC 5-40-1010	Yes. Same as Ref. No. AP-10	
Existing Stationary Sources-Part II: Emission Standards - Fuel Burning Equipment (Rule 4-8). Registration. See description of applicable requirements for 9 VAC 5-20-160.	All regulated pollutants	9 VAC 5-40-1020	No	No

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Existing Stationary Sources-Part II: Emission Standards - Fuel Burning Equipment (Rule 4-8). Facility and control equipment maintenance or malfunction. See description of applicable requirement for 9 VAC 5-20-180.	SO ₂ ; PM/PM ₁₀ , visible emissions	9 VAC 5-40-1030	Yes. Same as Ref. No. AP-5	
Existing Stationary Sources-Part II: Emission Standards - Open Burning (Rule 4-40). The following parts of this rule are state requirements only and are not federally enforceable: 5-40-5600B;5-40-5610A, B; 5-40-5610 C*; 5-40-5620 B-D,G; 5-40-5630 2, 4,7, 9; 5-40-5641.	Not specified in rule	9 VAC 5-40-5600 through 5640	No	No
New and Modified Stationary Sources-Part I: Special Provisions -Applicability. This rule does not impose specific requirements for sources or emission limits.	All regulated pollutants	9 VAC 5-50-10	No	No
New and Modified Stationary Sources-Part I: Special Provisions -Compliance. This rule gives general requirements for demonstrating compliance with applicable portions of Chapter 50, but does not impose specific requirements for sources or emission units.	All regulated pollutants	9 VAC 5-50-20	No	No
New and Modified Stationary Sources-Part I: Special Provisions -Performance testing. The owner shall provide, or cause to be provided, performance testing facilities as specified at 9 VAC 5-50-30F, upon the request of the board.	N/A	9 VAC 5-50-30F	No	No
Monthly and annual production of each product	VOC	9 VAC 5-50-50 Permit dated 10/05/01; Condition 26 (a).	No	Yes
Monthly and annual calculation of VOC emission. Annual VOC emissions shall be calculated as the sum of each consecutive 12 month period.	VOC	9 VAC 5-50-50 Permit dated 10/05/01; Condition 26 (a).	No	Yes
Monthly and annual calculation of speciated HAP emissions. Annual HAP emissions shall be calculated as the sum of each consecutive 12 month period.	HAP	9 VAC 5-50-50 Permit dated 10/05/01; Condition 26 (h).	No	Yes
Annual consumption of natural gas and fuel oil calculated monthly as the sum of each consecutive 12 month period.	N/A	9 VAC 5-50-50 Permit dated 10/05/01; Condition 26 (g).	No	Yes
Certificates of analysis for all oxalyl chloride batches purchased, indicating the phosgene concentration (in ppm) for each batch.	Phosgene	9 VAC 5-50-50 Permit dated 10/05/01; Condition 26 (c).	No	Yes
Date of receipt and volume delivered for each shipment of fuel oil.	N/A	9 VAC 5-50-50 Permit dated 10/05/01; Condition 26 (f).	No	Yes
New and Modified Stationary Sources-Part I: Special Provisions -Notification, records, and reporting. This rule requires existing source owners to keep records to determine emissions and regulatory exemption status.	All regulated pollutants	9 VAC 5-50-50F	Yes	Yes
New and Modified Stationary Sources - Part II: Emission Standards-Visible emissions. Visible emissions shall not exceed 20% opacity except for one six minute period in any one hour not to exceed more than 30% opacity. The presence of water vapor shall not be a violation of this section.	Visible emissions	9 VAC 5-50-80	No	No
New and Modified Stationary Sources - Part II: Emission Standards-Standard for fugitive dust/emissions sets forth reasonable precautions for preventing fugitive dust/emissions.	Fugitive dust	9 VAC 5-50-90	No	No
New and Modified Stationary Sources - Part II: Emission Standards-Test methods and procedures. The provisions of 9 VAC 5-50-20 A2 apply to determine compliance with the standard prescribed in 9 VAC 5-50-80.	Visible emissions	9 VAC 5-50-110	No	No
The emission rate increase of each toxic air pollutant from a new or modified process shall be evaluated for compliance with Condition 18. Records will be maintained as needed to show compliance. A report for each process change will be submitted within 30 days of implementing the change.	HAP	9 VAC 5-50-180 and 5-50-50. Permit dated 10/5/01; Condition 18, 26(b), and 27.	Yes	Yes
New and Modified Stationary Sources - Part II: Emission Standards- Standards of Performance for Stationary Sources (Rule 5-4). Applicability and designation of affected facility. This section defines affected facility, but does not impose specific requirements for sources or emission units.	All regulated pollutants	9 VAC 5-50-240	No	No
Emissions of VOC from the specialty chemical manufacturing equipment (SCME) emissions group shall not exceed 83.5 tons per year.	VOC	9 VAC 5-50-260; 5-80-850 Permit dated 10/5/01; Condition 17.	No	Yes. Same as Ref. No. AP-26
Emissions of HAP from the specialty chemical manufacturing equipment (SCME) emissions group shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for total HAP.	HAP	9 VAC 5-50-260; 5-80-850 Permit dated 10/5/01; Condition 17.	No	Yes. Same as AP-27.
Particulate emissions from handling, drying, drumming, and packaging operations shall be controlled by a fabric filter. The fabric filter will be maintained in working order at all times, and will be equipped with a device to continuously measure the differential pressure drop across the fabric filter.	PM/PM ₁₀	5-50-260; Permit dated 10/05/01; Conditions 3 and 4.	No	Yes

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Particulate emissions from the spray dryer will be controlled by a venturi scrubber. (See page 17 of Title V application forms for suggested streamlining).	PM/PM10	5-50-260; Permit dated 10/05/01; Condition 5.	No	Yes
The production of high purity calcium hydroxide shall not exceed 6,800 tons per year, calculated as the sum of each consecutive 12 month period.	PM/PM10	9 VAC 5-50-260 Permit dated 4/9/92; Condition 6.	No	Yes
Particulate emissions from the dryer shall be controlled by a baghouse. The baghouse will be maintained in working order at all times and will be equipped with a device to continuously measure the differential pressure drop across the fabric filter. (See page 17 of Title V application forms for suggested streamlining).	PM/PM10	9 VAC 5-50-260 Permit dated 4/9/92; Condition 3.	No	Yes
Particulate emissions from the calcium hydroxide railcar loading/shipping shall be controlled by a filter sack, or equivalent.	PM/PM10	9 VAC 5-50-260 Permit dated 4/9/92; Condition 4.	No	No
Particulate emissions from the calcium hydroxide supersack packaging and the calcium hydroxide conveying system shall be controlled by an inline filter, located prior to the nitrogen surge tank. (See page 17 of Title V application forms for suggested streamlining).	PM/PM10	9 VAC 5-50-260 Permit dated 4/9/92; Condition 5.	No	No
Volatile organic compound (VOC) emissions from condensers E05 A and B and the compressor loop shall be controlled by a flare. The flare shall be operated at all times when VOC emissions are vented to it. The presence of the flare pilot flame shall be monitored using a thermocouple or other equivalent device.	VOC	9 VAC 5-50-260 Permit dated 10/05/01; Conditions 9 and 10.	No	Yes
The maleic anhydride emission from the storage facility will be controlled by a wet scrubber.	Maleic anhydride	9 VAC 5-50-260 Permit dated 10/05/01; Condition 6.	No	Yes
The approved fuels for the boilers are natural gas and distillate oil. Distillate oil is defined as fuel oil that meets the specifications for fuel oil numbers 1 or 2 under the ASTM "Standards Specification for Fuel Oils". A change in the fuel may require a permit to modify and operate.	SO2	9 VAC 5-50-260 Permit dated 10/05/01; Conditions 12 and 14.	No	Yes. Same as Ref. No. AP-67
During production of crude CPPO, when using oxalyl chloride with a phosgene content greater than 200 ppm, phosgene emissions will be controlled by a caustic wet scrubber (scrubbing solution 3 to 15 percent free caustic). The scrubber will be provided with a flow meter and a device to continuously measure differential pressure through the scrubber.	Phosgene	9 VAC 5-50-260 Permit dated 10/05/01; Conditions 7 and 8.	No	Yes. Same as Ref. No. AP-29
Visible emissions shall not exceed 10 percent opacity except not to exceed 20 percent opacity in any one hour	Visible emissions	9 VAC 5-50-260 and 5-50-20. Permit dated 10/05/01; Condition 6.	No	No
Visible emissions shall not exceed 5 percent opacity.	Visible emissions	9 VAC 5-50-260 and 5-50-20. Permit dated 10/05/01; Condition 6.	No	No
Visible emissions shall not exceed 10 percent opacity.	Visible emissions	9 VAC 5-50-260 and 5-50-20. Permit dated 10/05/01; Condition 21.	No	No
Visible emissions shall not exceed 5 percent opacity.	Visible emissions	9 VAC 5-50-260 and 5-50-20. Permit dated 10/05/01; Condition 22.	No	No
Visible emissions shall not exceed 5 percent opacity.	Visible emissions	9 VAC 5-50-260 and 5-50-20. Permit dated 10/05/01; Condition 22.	No	No
Visible emissions shall not exceed 5 percent opacity.	Visible emissions	9 VAC 5-50-260 and 5-50-20. Permit dated 10/05/01; Condition 22.	No	No
Emissions from Boiler No. 4 shall not exceed 12.9 lbs/hr and 39 tons/yr.	SO2	9 VAC 5-50-260. Permit dated 10/05/01; Condition 16.	Yes. Same as Ref. No. AP-5	
New and Modified Sources - Part II: Emission Standards -Standard for visible emissions. See description for 9 VAC 5-50-80.	Visible Emissions	9 VAC 5-50-290	No	No
New and Modified Sources - Part II: Emission Standards -Standard for fugitive dust/emissions. See description for 9 VAC 5-50-90 .	Fugitive dust	9 VAC 5-50-300	No	No
New and Modified Sources - Part II: Emission Standards -Compliance. See description for 9 VAC 5-50-20.	All regulated pollutants	9 VAC 5-50-330	No	No
New and Modified Sources - Part II: Emission Standards -Test methods and procedures. See description for 9 VAC 5-50-30F.	N/A	9 VAC 5-50-340	No	No
New and Modified Sources - Part II: Emission Standards -Notification, records, and reporting. See description for 9 VAC 5-50-50F.	All regulated pollutants	9 VAC 5-50-360	See other table entries for permit conditions.	
New and Modified Sources - Part II: Emission Standards -Registration. See description for 9 VAC 5-20-160.	All regulated pollutants	9 VAC 5-50-370	No	No

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New and Modified Sources - Part II: Emission Standards -Facility and control equipment maintenance or malfunction. See description for 9 VAC 5-20-180.	All regulated pollutants	9 VAC 5-50-380	Yes. Same as Ref. No. AP-5	
Permits for New and Modified Sources. Specifies general requirements and provisions regarding application for and issuance of a permit to construct, reconstruct, relocate, or modify any stationary source.	All regulated pollutants	9 VAC 5-80-10	No	Yes
State Operating Permits for Stationary Sources. This rule incorporates all elements of the state operating permit regulation. XXXXXX's permit issued under this regulation establishes XXXXXX as a synthetic minor.	All regulated pollutants	9 VAC 5-80-800 through 5-80-1040.	No	Yes
Payment of biennial fee for facilities holding state operating permits.	All regulated pollutants	VA Environmental Law; Ch. 13, Article 1, Section 10.1 - 1322.B	Yes	Yes
Develop a maintenance schedule for air pollution control devices and maintain an inventory of spare parts.	VOC PM	9 VAC 5-50-20E Permit dated 10/05/01; Condition 33 Permit dated 4/9/92; Condition 13.	No	Yes
The permittee shall have available written operating procedures for the related air pollution control equipment. Operators shall be trained in the proper operation of all such equipment and shall be familiar with the written operating procedures. These procedures shall be based on the manufacturer's recommendations, at a minimum. The permittee shall maintain records of training provided.	VOC PM	9 VAC 5-50-20E Permit dated 10/05/01; Condition 33 Permit dated 4/9/92; Condition 14.	No	Yes
Boiler No. 4 shall consume no more than 1,098,600 gallons of distillate oil per year, calculated as the sum of each consecutive 12 month period.	SO2	9 VAC 5-170-160. Permit dated 10/05/01; Condition 13.	No	Yes
The maximum sulfur content of oil fired in Boiler No. 4 shall not exceed 0.5% by weight. Certification will be obtained from the fuel supplier with each shipment of fuel oil. The certification shall include name of the fuel supplier and statement that fuel oil meets ASTM D396 for numbers 1 or 2 fuel oil.	SO2	40 CFR 60.42c(d) 9 VAC 5-170-160 and 5-50-410. Permit dated 10/05/01; Condition 15.	No	Yes
Fuel quality reports will be submitted to the South Central Regional Office and EPA Region III within 30 days after each semi-annual period. The report shall be prepared as stated in Condition 28 of the permit dated 10/05/01.	SO2	40 CFR 60.48c(d) and 60.48c(e) 9 VAC 5-170-160 and 5-50-50. Permit dated 10/05/01; Condition 26(e), 28.	Yes	Yes
Boiler operators will be trained. Training will consist of a review and familiarization of manufacturer's operating instructions, at a minimum.	All regulated pollutants	9 VAC 5-170-160 Permit dated 10/05/01; Condition 11.	No	Yes
Daily and monthly natural gas and fuel oil consumption.	SO2	40 CFR 60.48c (g); 9 VAC 5-50-50 Permit dated 10/05/01; Condition 26(d).	No	Yes
A copy of all current air permits will be maintained on the facility premises.	N/A	9 VAC 5-80-860 D; Permit dated 10/05/01; Condition 37. Permit dated 4/9/92; Condition 17.	No	Yes
These tanks are subject to the requirements of paragraphs (a) and (b) of 40 CFR 60.116b only, which require that a record of the dimension and storage capacity of the vessel be kept readily available for the life of the tanks.	VOC	40 CFR Part 60 Subpart Kb - Standards of Performance for VOC Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.	No	Yes
Risk Management Plan. Requires assessment of off-site impacts for worst-case and alternate scenarios, and submittal of a written Risk Management Plan for listed chemicals present in quantities greater than regulatory threshold.	Chemicals listed at 40 CFR 68.130	40 CFR Part 68	Yes	Yes
This is a one-time requirement to offer opportunity for a public meeting to present components of the Risk Management Plan. Meeting must be held no later than February 1, 2000. A certification letter that the meeting was held must be submitted to the FBI.	N/A	Chemical Safety Information, Site Security and Fuels Regulatory Relief Act	Yes	Yes
Leak Detection and Repair. XXXXXX shall institute a fugitive LDAR per the program described in the attachment to the permit dated 10/5/01. Records shall be maintained at the facility.	VOC/ HAP	9 VAC 5-50-50 and 5-170-160; Permit dated 10/05/01; Conditions 25 and 26i.	No	Yes
The new owner must notify the South Central Regional Office of the change of ownership within 30 days of the transfer.	N/A	9 VAC 5-80-940; Permit dated 10/05/01 Condition 35.	Yes	Yes

(a) The annual update of emissions to the SAPCB will be the record of reporting and report format for this condition (see VAC 5-50-50F).